REQUEST FOR CATEGORICAL EXCLUSION

PROJECT/ACTIVITY DATA

Project/Activity Name:	Building a scalable model for personalized learning in Indian public schools
Geographic Location(s) (Country/Region)**:**	India
Amendment (Yes/No), if Yes indicate # (1, 2...)**:**	No
Implementation Start/End Dates (FY or M/D/Y):	FY2021 – FY 2024
If Amended, specify New End Date:	
Solicitation/Contract/Award Number(s):	APS9-7076
Implementing Partner(s):	Educational Initiatives Private Limited
Bureau Tracking ID:	DDI-21-190
Tracking ID of Related RCE/IEE (if any)**:**	
Tracking ID of Other, Related Analyses:	

ORGANIZATIONAL/ADMINISTRATIVE DATA

Implementing Operating Unit(s): (e.g. Mission or Bureau or Office)	DDI / ITR / DIV
Other Affected Operating Unit(s):	USAID / India
Lead BEO Bureau:	
Funding Operating Unit(s): (e.g. Mission or Bureau or Office)	DDI / ITR / DIV
Funding Account(s) (if available)**:**	DA
Original Funding Amount:	$1,500,000
If Amended, specify funding amount:	
If Amended, specify new funding total:	
Prepared by:	Jade Luo
Date Prepared:	8/18/2021

ENVIRONMENTAL COMPLIANCE REVIEW DATA

Analysis Type:	☒Request for Categorical Exclusion ☐Deferral
Environmental Determination(s):	☒Categorical Exclusion(s) ☐Deferred (per 22 CFR 216.3(a)(7)(iv))
RCE Expiration Date (if applicable):	
Additional Analyses/Reporting Required:	
Climate Risks Identified (#):	Low ___2___ Moderate ___0___ High ___0___
Climate Risks Addressed (#):	Low ___2___ Moderate ___0___ High ___0___

THRESHOLD DETERMINATION AND SUMMARY OF FINDINGS

PROJECT/ACTIVITY SUMMARY

Mindspark is a personalized adaptive learning (PAL) software developed by Educational Initiatives Private Limited (EI) to help facilitate individualized instruction in capacity-constrained environments. The innovation tailors math, language, and English content to each student's ability level and allows for teachers to access and apply learning data analytics. The program has been evaluated by RCTs in various settings, including afterschool programs and government day schools, and evaluations have shown statistically significant learning gains. The program can be used on tablets, laptops, and computers, and it is available in nine different languages targeting grades 1-10; since its inception, it has reached half a million unique students.

DIV funds would support (1) the scale-up of Mindspark in a selection of public schools where hardware is already available, (2) advocacy and technical assistance efforts with state MoE and other partners to establish norms and infrastructure for PAL scale-up, as well as (3) track outcomes related to scale-up and conduct A/B testing in schools to better understand effective implementation practices for scale-up.

ENVIRONMENTAL DETERMINATIONS

Upon approval of this document, the determinations become affirmed, per Agency regulations (22 CFR 216).

TABLE 1: ENVIRONMENTAL DETERMINATIONS

Projects/Activities	Categorical Exclusion Citation (if applicable)	Deferral[1]
Project/Activity 1: Discussion with the key officials in the State MoE to align on government support and program modalities	§216.2(c)(2)(i)	☐
Sub-activity 1.1: Finalization of action plan and obtaining buy-in to implement in a set of schools with enabling conditions	§216.2(c)(2)(i)	☐

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[1] Deferrals must be cleared through an Amendment to this RCE prior to implementation of any deferred activities.

Project/Activity 2: Logistics planning in the state-Coordinating with the block/district officers for permissions and documentation related to roll-out, training and periodic reviews	§216.2(c)(2)(i), §216.2(c)(2)(v)	☐
Sub-activity 2.1: Recruitment of field staff and school scoping survey	§216.2(c)(2)(i)	☐
Project/Activity 3: Ensuring school readiness for Mindspark implementation	§216.2(c)(2)(i)	☐
Sub-activity 3.1: Procuring auxiliary hardware (where needed), installation at school	§216.2(c)(2)(i)	
Sub-activity 3.2: Provisioning teacher and student access and integration with school time table	§216.2(c)(2)(i)	☐
Project/Activity 4: Ensuring Mindspark usage and tracking usage statistics	§216.2(c)(2)(i), §216.2(c)(2)(iii)	☐
Sub-activity 4.1: Capacity building of key stakeholders, troubleshooting and set up of monitoring dashboards	§216.2(c)(2)(i)	
Sub-activity 4.2: A/B Testing to enable effective scale-up and implementation of Mindspark through increased teacher buy-in at schools and higher parental engagement at home	§216.2(c)(2)(i), §216.2(c)(2)(iii)	
Sub-activity 4.3: Course-Correction: Recording usage data and analytics and optimization of the programme implementation	§216.2(c)(2)(i), §216.2(c)(2)(iii)	☐

Project/Activity 5: Follow-up on the program with monthly training, meetings and reporting for key stakeholders	§216.2(c)(2)(i), §216.2(c)(2)(xiv)	☐
Sub-activity 5.1: Monthly meetings with key officials at district and state levels to update on progress and share technical details on implementation challenges	§216.2(c)(2)(i), §216.2(c)(2)(xiv)	
Sub-activity 5.2: Capacity building for teachers and collection of feedback for teacher level material and dashboards	§216.2(c)(2)(i)	
Sub-activity 5.3: Recognition of high-performing teachers and schools that record high usage	§216.2(c)(2)(i)	☐
Project/Activity 6: Advocacy activities in the states- Technical capacity building through workshops/ seminars/ conferences with public practitioners	§216.2(c)(2)(i), §216.2(c)(2)(iii), §216.2(c)(2)(xiv)	☐
Sub-activity 6.1: Create and disseminate high-quality, publicly available knowledge products on EdTech implementation in the form of detailed manuals, process discovery documentation, videos on training, execution, and teaching practices, on national and global platforms	§216.2(c)(2)(i), §216.2(c)(2)(iii), §216.2(c)(2)(xiv)	
Sub-activity 6.2: Tracking public and private sector uptake of PAL indicated by number of government	§216.2(c)(2)(i), §216.2(c)(2)(iii), §216.2(c)(2)(xiv)	☐

tenders for PAL, mentions and citations in global and national public policy dialogue, and number of publicly available knowledge products created		

CLIMATE RISK MANAGEMENT

The design teams considered the potential effect of climate risks/stressors on the sustainability of the project. Only *Low* risks were identified, and these risks can be managed. Please see *Annex 1: Activity Climate Risk Management Summary Table* for Building a scalable model for personalized learning in Indian public schools for additional detail.

The climate risk in this project will mainly arise out of the elements of multiple human interactions and use/deployment of hardware in the school premises. Multiple face-to-face meetings with key stakeholders in the government as well as peer interactions in the classroom where learners would be learning, both of which are crucial to the success of the project, will risk public health and hence, it will be strictly advised to adhere to all Covid-19 safety protocols and monitor health regularly.
Considering the project locations could be remote and in harsh weather, there is a risk of hardware getting damaged. The team will mitigate it by leveraging the best practices learned over the course of prior implementation in such geographies and adequate measures will be deployed to mitigate the risk of hardware damage; all the learning data is stored on cloud servers and is safe in the face of any such damage.

BEO SPECIFIED CONDITIONS OF APPROVAL

COVID-19 Condition: In order to reduce COVID-19 transmission during implementation of this activity, the IP must:

- Ensure that all activities addressed by this RCE adhere to current, applicable COVID-19 guidelines. Such measures may include, but are not limited to social distancing, use of personal protective equipment, limiting the size of gathering and travel, and effective disinfection.
- Follow:
    - Applicable COVID-19 guidance from local authorities.
    - The following Agency-wide "COVID-19 GUIDANCE FOR IMPLEMENTING PARTNERS PAGE" page on the USAID website: https://www.usaid.gov/work-usaid/resources-for-partners/covid-19-guidance-implementing-partners
    - Ensure that all involved staff have appropriate training, authorization, and resources to meet the expectations of the applicable guidance while implementing these activities.

IMPLEMENTATION

In accordance with 22 CFR 216 and Agency policy, the conditions and requirements of this document become mandatory upon approval. This includes the relevant limitations, conditions and requirements in this document as stated in Section 3 of this RCE and any BEO Specified Conditions of Approval.

USAID APPROVAL OF INITIAL ENVIRONMENTAL EXAMINATION

PROJECT/ACTIVITY NAME: ___Building a scalable model for personalized learning in Indian public schools_____

Bureau Tracking ID: DDI-21-190

Approval:	Jonathan Ng, /s/ (email clearance)	9/10/21
	[NAME], Mission Director or Washington DC Equivalent [*required*]	Date
	Jonathan Ng, Acting Director, Innovation Division	
Clearance:	Jade Luo, /s/ (email clearance)	9/10/21
	[NAME], Activity Manager [*as appropriate*]	Date
	Jade Luo, Program Specialist, Development Innovation Ventures	
Clearance:	Crystal Byrd Ogbadu, /s/ (email clearance)	9/10/21
	[NAME], A/COR [*required*]	Date
	Crystal Byrd Ogbadu, Program Economics Officer, Development Innovation Ventures	

Teresa Bernhard

Concurrence:		9/13/2021
	Teressa Bernhard, Bureau Environmental Officer	Date

DISTRIBUTION:

1.0 PROJECT AND ACTIVITY DESCRIPTION

1.1 PURPOSE OF THE RCE

The purpose of this document is to establish that all proposed projects/activities belong to classes of actions eligible for Categorical Exclusions as set out in Agency regulations (22 CFR 216.2(c)) and that there are no foreseeable significant direct or indirect impacts that would preclude them from receiving a Categorical Exclusion. Upon approval of this document, the Categorical Exclusions are affirmed for the project/activity. This analysis also documents the results of the project/activity level Climate Risk Management process in accordance with USAID policy (specifically, ADS 201 mandatory reference 201mal).

This RCE is a critical element of USAID's mandatory environmental review and compliance process meant to achieve environmentally sound activity design and implementation.

1.2 PROJECT/ACTIVITY OVERVIEW

Mindspark is a personalized adaptive learning (PAL) software developed by Educational Initiatives Private Limited (EI) to help facilitate individualized instruction in capacity-constrained environments. The innovation tailors math, language, and English content to each student's ability level and allows for teachers to access and apply learning data analytics. The program has been evaluated by RCTs in various settings, including afterschool programs and government day schools, and evaluations have shown statistically significant learning gains. The program can be used on tablets, laptops, and computers, and it is available in nine different languages targeting grades 1-10; since its inception, it has reached half a million unique students.

DIV funds would support (1) the scale-up of Mindspark in a selection of public schools where hardware is already available, (2) advocacy and technical assistance efforts with state MoE and other partners to establish norms and infrastructure for PAL scale-up, as well as (3) track outcomes related to scale-up and conduct A/B testing in schools to better understand effective implementation practices for scale-up.

1.3 PROJECT/ACTIVITY DESCRIPTION

EI will enable the required coalition of funders, practitioners, researchers and the government to strengthen the state capacity of procuring all elements of PAL, deploy and integrate the learning software in the time-table by leveraging existing computing hardware in government schools, work to increase usage for each child/school, utilise the learning data generated to inform curriculum & teacher training for the State and ultimately ensuring student learning outcomes are rising as measured by State or 3rd party evaluation agencies and researchers. Access case studies of the implementation in Churu, Rajasthan via youtu.be/41Hm5gZBJrs and Himachal Pradesh https://youtu.be/W25p4HvIm0g.

This project is proposed to be implemented in the states of Rajasthan, Gujarat and Himachal Pradesh in schools across the rural, semi-urban and urban areas. The state of Rajasthan is an arid or semi-arid, desert with tropical and hot climate throughout the year although with extreme winter, Himachal Pradesh is located at a higher altitude and remains cool throughout the year and Gujarat is a coastal state with hot summers and mild winters. In previous experiences implementing Mindspark in these three states, there have been no issues with hardware despite temperature variations. However, to protect against dust damage in the desert regions of Rajasthan, we have previously placed plastic covers on laptop screens and keyboards. There may be a need to upgrade or repair existing hardware or add protective equipment that may be required in these labs, especially after prolonged school closures. We propose to allocate >˜5% of total funding for this purpose. Old or dysfunctional accessories will be collected and sent to recycling units in towns near these schools.

This project will involve the use of laptops/fit for purpose devices in schools' labs, transportation of staff to sites, and adherence to guidelines for COVID-safety. Implementation of the project requires electricity and transportation infrastructure. This award will be using existing infrastructures (transportation, laptops that have already been purchased for the school) for the project activities.

TABLE 2: DEFINED OR ILLUSTRATIVE PROJECTS/ACTIVITIES AND SUB-ACTIVITIES

Project/Activity 1: Discussion with the key officials in the State MoE to align on government support and program modalities
Sub-activity 1.1: Finalization of action plan and obtaining buy-in to implement in a set of schools with enabling conditions
Project/Activity 2: Logistics planning in the state- Coordinating with the block/district officers for permissions and documentation related to roll-out, training and periodic reviews
Sub-activity 2.1: Recruitment of field staff and school scoping survey
Project/Activity 3: Ensuring school readiness for Mindspark implementation
Sub-activity 3.1: Procuring auxiliary hardware (where needed), installation at school
Sub-activity 3.2: Provisioning teacher and student access and integration with school timetable
Project/Activity 4: Ensuring Mindspark usage and tracking usage statistics
Sub-activity 4.1: Capacity building of key stakeholders, troubleshooting and set up of monitoring dashboards
Sub-activity 4.2: A/B Testing to enable effective scale-up and implementation of Mindspark through increased teacher buy-in at schools and higher parental engagement at home

Sub-activity 4.3: Course- Correction: Recording usage data and analytics and optimization of the programme implementation	
Project/Activity 5: Follow-up on the program with monthly training, meetings and reporting for key stakeholders	
Sub-activity 5.1: Monthly meetings with key officials at district and state levels to update on progress and share technical details on implementation challenges	
Sub-activity 5.2: Capacity building for teachers and collection of feedback for teacher level material and dashboards	
Sub-activity 5.3: Recognition of high-performing teachers and schools that record high usage	
Project/Activity 6: Advocacy activities in the states- Technical capacity building through workshops/ seminars/ conferences with public practitioners	
Sub-activity 6.1: Create and disseminate high-quality, publicly available knowledge products on EdTech implementation in the form of detailed manuals, process discovery documentation, videos on training, execution, and teaching practices, on national and global platforms	
Sub-activity 6.2: Tracking public and private sector uptake of PAL indicated by number of government tenders for PAL, mentions and citations in global and national public policy dialogue, and number of publicly available knowledge products created	

2.0 ENVIRONMENTAL ANALYSIS

2.1 JUSTIFICATION FOR CATEGORICAL EXCLUSION

The activities under the *A Media Experiment to Reduce Intimate Partner Violence in Bangladesh* are among the classes of actions listed in 22 CFR 216.2(c)(2) and have no foreseeable significant direct or indirect adverse effect on the environment. Therefore, under 22 CFR 216.2(c)(1), neither an IEE nor an EA will be required for these activities. Instead, a Categorical Exclusion is recommended for the projects/activities described above in Section 1.3 as follows:

TABLE 3**: RECOMMENDED DETERMINATION FOR CATEGORICAL EXCLUSION**

Project/Activity and Sub-Activity #	Recommended Determination for Categorical Exclusion
Project/Activity 1, 2, 3, 4, 5, 6	§216.2(c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the

Sub-activity 1.1, 2.1, 3.1, 3.2, 4.1, 4.2, 4.3, 5.1, 5.2, 5.3, 6.1	environment (such as construction of facilities, etc.)
Project/Activity 4, 6, Sub-activity 4.2, 4.3, 6.1, 6.2	§216.2(c)(2)(iii) Analyses, studies, academic or research workshops and meetings
Project/Activity 2	§216.2(c)(2)(v) Document and information transfers
Project/Activity 5, 6, Sub-activity 5.1, 6.1, 6.2	§216.2(c)(2)(xiv) Studies, projects or programs intended to develop the capability of recipient countries to engage in development planning, except to the extent designed to result in activities directly affecting the environment (such as construction of facilities, etc.)

2.2 CLIMATE RISK MANAGEMENT

This section summarizes the methodology used and findings of the CRM Screening (see Annex 1). The project design team, in consultation with the CIL, considered the potential effect of climate risks/stressors on the sustainability of the project (changing precipitation patterns, rising temperature, floods, droughts, fires, landslides, etc.) in addition to the impact of project activities on the climate (increased greenhouse gas emissions, land use changes, etc.).

3.0 LIMITATIONS OF THE CATEGORICAL EXCLUSION

The categorical exclusions recommended in this document apply only to projects/activities and sub-activities described herein.

Other projects/activities that may arise must be subject to an environmental analysis and the appropriate documentation prepared and approved, whether it be a new Request for Categorical Exclusion, an amendment, or other type of 22 CFR 216 document.

It is confirmed that the projects/activities described herein do not involve actions normally having a significant effect on the environment, including those described in 22 CFR 216.2(d).

3.1 MANDATORY INCLUSION OF ENVIRONMENTAL COMPLIANCE REQUIREMENTS IN SOLICITATIONS, AWARDS, BUDGETS, AND WORK PLANS

USAID will ensure the environmental compliance requirements are incorporated into solicitations, awards, budgets, and work plans, including relevant limitations of Section 3 above. In addition, climate risk management requirements will also be incorporated.

USAID will ensure that the following requirements are met:

- Provide briefings for Implementing Partner (IP) on environmental compliance responsibilities
- Ensure integration of compliance responsibilities in prime and sub-awards and grant agreements;
- Ensure compliance with applicable partner country requirements
- Annual review of project activities to ensure that scope is still covered by Categorical Exclusion
- Ensure protocols for protection of human subjects are followed.

ATTACHMENTS:

Annex 1: Climate Risk Management Summary Table for "Building a scalable model for personalized learning in Indian public schools" project

ANNEX 1. **PROJECT** CLIMATE RISK MANAGEMENT SUMMARY TABLE

Defined or Anticipated Project Elements[2]	Climate Risks[3]	Risk Rating[4]	How Risks are Addressed at Project Leve[5]l	Further Analysis and Actions for Activity Design/ Implementation[6]	Opportunities to Strengthen Climate Resilience[7]
Government and school buy-in to implement a personalized learning programme, regular meetings and	Increased temperatures and variability in rainfall, as well as increased intensity, duration, and/or frequency of	Low	Face-to-face meetings will observe Covid-19 guidelines and online mediums will be leveraged for	Develop SOP's for selection of schools that meet the key enabling conditions .	The staff and the program beneficiaries will be trained on safety protocols and awareness to implement in-school

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[2] Purpose/Sub-purpose, Area of Focus, or Activity/ Mechanism, etc.

[3] List key risks related to the project elements identified through either the strategy- or project-level climate risk assessment.

[4] Low/Moderate/ High

[5] Describe how risks have been addressed at the project level. If a decision has been made to accept the risk, briefly explain why.

[6] Describe CRM measures to be integrated into activity design or implementation, including additional analysis, if applicable.

[7] Describe opportunities to achieve development objectives by integrating climate resilience or mitigation measures.

communication with all key stakeholders (Activities 1, 2, 3, 4, 5, 6)	extreme climate-related events such as droughts or floods may disrupt power and communication networks, disrupt logistics networks to deploy staff and equipment, impede access routes, for trainers and damage structures that host capacity building activities.		stakeholder communication. The selection of schools that host Mindspark labs is based on them meeting certain enabling conditions. Key among these is the presence of a well-built room for the lab, with good flooring, roofing and walls without water damage. This ensures that devices within these labs are kept safe from any climate-related damage. Additionally, only those schools with regular power supplies are chosen. In these labs, children will access Mindspark in an 'offline' mode – i.e. internet is not needed on continuous basis for Mindspark to work.		programs with necessary precautionary measures. Raise awareness of teachers, students or training participants about climate vulnerability and resilience. Where practical, the team will explore, identify and act upon opportunities to incorporate climate change/risk education elements in capacity building/training modules

			Therefore, disruptions in internet connectivity will not hamper Mindspark usage.		
	Severe weather conditions like heat, humidity, cold could cause damage and destruction of hardware

Increased temperatures and variability in rainfall, as well as increased intensity, duration, and/or frequency of extreme climate-related events such as droughts and floods may disrupt targeted technical assistance. | Low | The team will ensure hardware, software, and data is stored appropriately and that data is backed up in various locations.

In the last 5 years, Ei has established operational labs in both the hottest (Rajasthan) and coldest (Himachal Pradesh) parts of the country and has done so without difficulty. Rigorous processes are in place to ensure that labs are established only in places where enabling conditions are met which ensure minimal hardware damage due to severe weather. | An action plan will be in place to mitigate any effects of large climate events that could impact learning labs and existing hardware and software

Provide respective education service with accurate and timely weather/climate forecasting.

Frequent storage of learning analytics from the software to mitigate data loss in case of a severe weather condition. | Suggestions on building for resilient structures will be provided to the government to ensure safety and longevity of the school structure. Encourage the inclusion of climate change information and disaster preparedness in monitoring and learning activities |
| Provision of auxiliary / leveraging of existing hardware (Activities 2, 3) | | | | | |

			We have developed robust technical assistance mechanisms, both in-person and remote, to ensure that minimal disruption on this front.		